

**IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE
FOR THE MIDDLE DISTRICT
NASHVILLE DIVISION**

JENAI HAYES,)	No. 3:20-cv-01023 LEAD CASE
)	
DR. LILY MORENO LEFFLER,)	Judge Trauger
)	(CONSOLIDATED)
)	
and)	
)	
DR. JAMES BAILEY,)	
DR. PIPPA MERIWETHER, and)	
DR. DAMON CATHEY,)	
)	
Plaintiffs,)	
)	
v.)	
)	
METROPOLITAN GOVERNMENT)	
OF NASHVILLE AND DAVIDSON)	
COUNTY, TENNESSEE and)	
DR. ADRIENNE BATTLE,)	
)	
Defendants.)	

DECLARATION OF CAMEO BOBO
[28 U.S.C. § 1746]

I, Cameo Bobo, hereby declare under the penalties of perjury, the following:

1. I am over the age of 18 and competent to testify to the matters stated herein, which are based on my own personal knowledge.
2. I am the Coordinator of Board Operations at the Metropolitan Nashville Public Schools (“MNPS”). I have been employed with MNPS during and since the incidents that form the basis for this lawsuit.
3. As part of my duties as Coordinator of Board Operations, I have access to and am a custodian of the meeting minutes for the MNPS Board of Education. These minutes are created

and maintained in the normal course and scope of the MNPS's business by persons whose duties include the creation, compilation, and/or retention of the meeting minutes.

4. A true and correct copies of the Board of Education meeting agenda and minutes for the meetings held on May 19, 2020, May 26, 2020, June 30, 2020, June 22, 2021, and June 28, 2022 (agenda only) are attached.

5. As part of my duties as Coordinator of Board Operations, I also attend all Board of Education meetings. This includes committee meetings. Committee meetings and regular Board meetings are recorded by the Metropolitan Government's Metro Nashville Network ("MNN"), a division of Metropolitan Governments ITS Department and are uploaded to YouTube by MNN.

6. True and accurate recordings of the meetings are attached and can be found on YouTube through the following links:

- 2/11/2020 MNPS Budget and Finance Committee [02/12/20 MNPS Budget and Finance Committee - YouTube](#)
- 2/25/2020 MNPS Budget and Finance Committee [02/25/20 MNPS Budget and Finance Committee - YouTube](#)
- 5/12/2020 MNPS Budget and Finance Committee [05/12/20 MNPS Budget and Finance Committee - YouTube](#)
- 5/19/2020 MNPS Specially Called Board Meeting [05/19/20 Special Called MNPS Board of Education - YouTube](#)
- 5/26/2020 MNPS Board Meeting [05/26/20 MNPS Board of Education - YouTube](#)
- 6/30/2020 MNPS Board Meeting [06/30/20 Special Called MNPS Board of Education - YouTube](#)
- 06/22/2021 MNPS Board Meeting [06/22/21 MNPS Board of Education - YouTube](#)
- 06/28/2022 MNPS Board Meeting [06/28/22 MNPS Board of Education - YouTube](#)



CAMEO BOBO

7/26/2022

DATE

{N0484584 1}

Certificate of Service

I hereby certify that a true and accurate copy of the forgoing has been served via CM/ECF to: Ann Buntin Steiner, Steiner & Steiner, LLC, 613 Woodland Street, Nashville, TN 37206, and Jesse Ford Harbison, Jesse Ford Harbison Law, PLLC, 1109 N. 6th Street, Nashville, TN 37207 on July 27, 2022

/s/ J. Brooks Fox
J. Brooks Fox